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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
PURDUE PHARMA L.P., et al.,	Case No. 19-23649 (RDD)
Debtors. ¹	(Jointly Administered)

DEBTORS' MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT IN FILING MEMORANDUM OF LAW IN OPPOSITION TO THE MOTIONS FOR STAYS OF THE CONFIRMATION ORDER AND THE ADVANCE ORDER PENDING APPEAL

Purdue Pharma L.P. ("**PPLP**") and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the "**Debtors**"), respectfully

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

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represent as follows in support of this motion ("**Motion**"):

1. The Second Amended Order Establishing Certain Notice, Case Management, and

Administrative Procedures, entered on November 18, 2019 [Dkt. No. 498] ("Case Management

Order" or "CMO"), provides that "[u]nless granted prior permission, motions, applications and

objections are limited to 40 pages and replies and statements are limited to 20 pages." (CMO

Ex. 1, ¶ 15.)

2. Seven different parties have submitted a total of six motions for stays pending

appeal. For the convenience of the Court and the objecting parties, the Debtors are filing

simultaneously herewith a Memorandum of Law in Opposition to the Motions for Stays of the

Confirmation Order and the Advance Order Pending Appeal ("Stay Opposition Brief") that

responds to the six motions instead of filing as many as six separate opposition briefs.

3. To effectively respond to the motions in a single memorandum and facilitate the

orderly presentation of issues to the Court, the Debtors require more than the 40 pages permitted

by the Case Management Order. The length of the Debtors' Stay Opposition Brief is 59 pages,

exclusive of the table of contents and table of authorities.

4. For the above reasons, the Debtors respectfully request that this Court grant the

Debtors leave to file a Stay Opposition Brief of 59 pages, exclusive of the table of contents and

table of authorities filed simultaneously herewith.

Dated: October 22, 2021

New York, New York

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By: /s/ Marc J. Tobak

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